

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>HARRISON COMPANY LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>CIVIL ACTION NO. 3:19-CV-1057-B</b>
	§	
<b>A-Z WHOLESALERS INC. and</b>	§	
<b>BARKAT G. ALI,</b>	§	
	§	
<b>Defendants.</b>	§	

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**AGREED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER  
AND BRIEF IN SUPPORT**

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Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 7.1, Plaintiff Harrison Company, LLC (“Harrison”) and Defendants A-Z Wholesalers Inc. and Barkat G. Ali (collectively, “Defendants”) file this Agreed Motion for Entry of Agreed Protective Order and Brief in Support and state:

1. Harrison and Defendants (collectively, the “Parties”) seek to exchange certain documents during discovery in this case that may include sensitive, proprietary, and/or confidential information, including—but not limited to—confidential financial information.

2. Under Federal Rule of Civil Procedure 26(c)(1), the Court may, for good cause, issue an order requiring that information not be revealed, or be revealed only in a specified way, and requiring that the parties file specified documents or information under seal.

3. Good cause exists for entry of a protective order because the information to be exchanged is proprietary, financial, and commercial information not publicly known. *See, e.g., Total Rx Care, LLC v. Great Northern Ins. Co.*, 2016 WL 9559917, at \*2 (N.D. Tex. Dec. 30, 2016).

4. The Parties have agreed to an Agreed Protective Order in the form attached as Exhibit “A,” which will govern the use and disclosure of documents produced in the above-captioned lawsuit.

5. In order to protect the confidential information of the Parties, Harrison and Defendants respectfully requests that the Court enter the Agreed Protective Order.

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

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/s/ Guy H. Holman (with permission)

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**CERTIFICATE OF SERVICE**

I certify that on April 29, 2020, I served a copy of the foregoing document on all parties through their counsel of record via the Court's ECF system.

/s/ Anna K. Finger

Counsel for Plaintiff